

Summary of Plaintiff's Trial Fees

Date	Narrative	Attorney	Hours	Amount
05/09/2022	Discussing Court MSJ decision and trial with co counsel	Gilliam, Matt B	0.3	\$105.00
05/10/2022	Discussing Court MSJ decision and trial with co counsel	Gilliam, Matt B	0.1	\$35.00
05/11/2022	Reviewing Court amended scheduling order (.6); outlining documents and materials needed for pre trial deadlines (1.0); drafting templates for deposition designations, exhibit lists, witness lists, and other documents needed for pretrial deadlines (2.0)	Gilliam, Matt B	3.6	\$1,260.00
05/12/2022	Drafting templates for deposition designations, exhibit lists, witness lists, and other documents needed for pretrial deadlines (6.0); communications with local counsel re trial issues and logistics (2.0)	Gilliam, Matt B	8.0	\$2,800.00
05/13/2022	Researching re voir dire and jury selection (2.0); outlining trial strategies (2.0) and identifying witnesses for witness list (1.0)	Gilliam, Matt B	5.5	\$1,925.00
05/16/2022	Preparing exhibit lists (4.0); preparing pretrial disclosures report (1.7); conference call with SWA and L556 to discuss trial days and number of jurors needed (.1); phone call with client re trial and status of case (2.0); draft joint status report re trial time and number of jurors (1.5)	Gilliam, Matt B	9.3	\$3,255.00
05/17/2022	Finalizing draft of joint status report (.3); circulating to SWA and Local 556 for review and approval (.2); filing joint status report (.1); drafting joint pretrial order (2.0); phone call with client re mediator inquiry (.5); trial preparation on damages issues (2.0)	Gilliam, Matt B	5.1	\$1,785.00
05/18/2022	Drafting joint pretrial order (3.3); communications with SWA about their motion for reconsideration; evaluating SWA plans for motion; and communications with co counsel re SWA motion (1.5)	Gilliam, Matt B	4.8	\$1,680.00
05/19/2022	Preparing jury instructions and charges (3.0); phone call with local counsel re pretrial preparation of documents and deadlines (2.3)	Gilliam, Matt B	5.3	\$1,855.00
05/23/2022	Preparing trial exhibits and witness lists (1.6); preparing contents for joint pretrial order (1.0); preparing joint status report (1.5); preparing response to reconsideration motion (6.7)	Gilliam, Matt B	4.1	\$1,435.00
05/25/2022	Phone call with co counsel regarding trial planning, trial documents, and engagement of trial counsel (1.0); reviewing amended order and new deadlines (.5); reviewing order denying motion for reconsideration and discussing with co counsel (.7)	Gilliam, Matt B	2.2	\$770.00
05/26/2022	Phone call with Matt Hill re case, possible engagement as trial counsel, and trial questions	Gilliam, Matt B	1.0	\$350.00
05/27/2022	Phone call with Matt Hill re engagement as trial counsel (.5); phone call with legal director re engagement of Pryor and Bruce as trial counsel (.5)	Gilliam, Matt B	1.0	\$350.00
05/31/2022	Drafting engagement letter	Gilliam, Matt B	1.3	\$455.00
06/01/2022	Drafting proposed jury charge, instructions, and interrogatories, reviewing and researching supporting case law, and researching and incorporating pattern jury instructions for claims and damages (9.5); reviewing Pryor and Hill notice of appearance (.2); conference with M Hill re pretrial filings and documents needed for pre trial filings (1.0)	Gilliam, Matt B	10.7	\$3,745.00

06/02/2022	Drafting proposed jury charge, instructions, and interrogatories, reviewing and researching supporting case law, and researching and incorporating pattern jury instructions for claims and damages (8.4); conference with M Hill and B Pryor re status and strategy for trial and preparing pretrial filings (1.3); email exchange with M Hill re trial documents (.3)	Gilliam, Matt B	10.0	\$3,500.00
06/03/2022	Drafting proposed jury charge, instructions, and interrogatories, reviewing and researching supporting case law, researching and incorporating pattern jury instructions for claims and damages	Gilliam, Matt B	8.7	\$3,045.00
06/04/2022	Drafting proposed jury charge, instructions, and interrogatories, reviewing and researching supporting case law, researching and incorporating pattern jury instructions for claims and damages (8.8); send draft jury charge and interrogatories to trial counsel (.2)	Gilliam, Matt B	9.0	\$3,150.00
06/05/2022	Drafting exhibit lists and witness lists and sending drafts of each to trial counsel (.5); drafting joint pretrial order with summary of Carter claims, list of proposed stipulated facts, list of contested issues of fact and law, and status of settlement discussions (5.9); emailing trial counsel re case documents for trial (.5); communicating with trial counsel re subpoena and witness issues (1.0); researching witness subpoena issues (1.5); reviewing and commenting on J Winford motion to withdraw (.3)	Gilliam, Matt B	9.7	\$3,395.00
06/06/2022	Researching and drafting Carter motion in limine (6.0); gathering and organizing exhibits (.3); preparing witness lists (1.6); conference calls with trial counsel hill and pryor re witnesses and trial strategy and pretrial tasks (2.5); providing trial counsel with case documents (.3)	Gilliam, Matt B	10.7	\$3,745.00
06/07/2022	Reviewing pryor voir dire questions and add add questions (.6); research and draft motion in limine and send to trial counsel (5.5); conference call with Greenfield and Cloutman re witnesses and subpoena issues (1.0); responding to SWA draft joint pretrial order (1.4); revising joint pretrial order (5.5); reviewing and editing revised draft jury instructions (1.0); conferences with Matt Hill re pretrial tasks and strategy (.2); email trial counsel re voir dire questions and comments (.2);	Gilliam, Matt B	15.4	\$5,390.00
06/08/2022	Reviewing and revising exhibit lists (1.0); preparing deposition designations (.8); editing SWA Joint Pretrial Order summary of claims, contested issues of law and fact, and jury instructions for all claims against SWA and L556 (5.0); revising jury charges and interrogatories with additional instructions re SWA undue hardship argument and Carter speech protections, adding objections to SWA jury charges and interrogatories, updating citations to claims instructions (7.5); conferences and emails with M Hill re pretrial document status and strategy, joint and separate jury charges, proposed objections to disputed jury charges, punitive damages issues, and pretrial filings (1.5)	Gilliam, Matt B	15.8	\$5,530.00

06/09/2022	Preparing trial exhibits and sending to SWA for delivery to Court (2.2); reviewing and responding to SWA and L556 drafts of joint pretrial order, instructions, and interrogatories, and incorporating trial counsel comments (3.2); reviewing and commenting on trial counsel draft objections to SWA jury interrogatories (1.0); finalizing tables for motion in limine, revising motion in limine, and incorporating trial counsel revisions to motion in limine (3.0); incorporating trial counsel revisions to deposition designations (.5); preparing deposition designations (1.5); revising objections to SWA and L556 instructions re claims and damages and incorporating additional trial counsel edits to jury interrogatories and instructions (2.0); conferences with trial counsel Hill re jury interrogatories, instructions, and pretrial filings (1.0); conferences with opposing counsel re structuring joint pretrial order and filings (.5); finalize and file pretrial documents (1.5)	Gilliam, Matt B	17.4	\$6,090.00
06/10/2022	Drafting Joint Status Report objections to exhibits, witnesses, and deposition designations, preparing counter designations (7.6); communicating with SWA and L556 counsel re Joint Status Report planning and logistics and exchanging objections to prepare responses (.5); reviewing subpoenas to SWA and L556 and communicating with trial counsel Hill re same and witness issues (1.0); conferences with opposing counsel re witness and subpoena issues (.5)	Gilliam, Matt B	9.6	\$3,360.00
06/11/2022	Drafting Joint Status Report objections to exhibits, witnesses, and deposition designations, preparing counter designations (5.5); emailing trial counsel re draft objections to exhibits, witnesses, and deposition designations (.5); incorporating trial counsel revisions and comments to objections (.7); research and draft response to SWA motion in limine (4.2)	Gilliam, Matt B	10.9	\$3,815.00
06/12/2022	Finalizing and sending opposing counsel Joint Status Report objections to exhibits, witnesses, and deposition designations, and counter designations (3.8); research and draft response to SWA motion in limine and send to trial counsel (3.0); drafting and researching responses to SWA and L556 objections to Carter exhibits, witnesses, and depo designations (8.2); communicating with trial counsel re Carter desire to add additional exhibits and SWA request to add Carter initial disclosures to exhibits (1.0); communicating with trial counsel re Carter objections to SWA jury instructions (.5);	Gilliam, Matt B	16.5	\$5,775.00
06/13/2022	Preparing joint status report, objections to SWA and L556 proposed jury instructions and interrogatories (3.1); preparing and sending responses to objections to witnesses and exhibits to L556 and SWA (1.1); preparing for and conferring about objections and responses to witnesses and exhibits with L556 and SWA (1.0); reviewing and editing joint status report (1.0); preparing and sending email to court and parties re supplementing the court's exhibit file with omitted portions of exhibits (.5); reviewing order re notifying the court of unavailable witnesses (.3); reviewing court order on time limits (.2)	Gilliam, Matt B	7.2	\$2,520.00

06/14/2022	Conducting phone conference with trial counsel Hill and Pryor re pretrial conference planning, witness and subpoena issues, and trial preparation (.8); evaluating trial strategy and legal issues re witnesses and subpoenas (3.1); preparing draft notice of unavailable witnesses and emailing trial counsel re same (4.6)	Gilliam, Matt B	8.5	\$2,975.00
06/15/2022	Finalizing notice of unavailable witnesses (1.0); traveling to Dallas for pretrial conference hearing (8.0); preparing for pretrial conference, reviewing documents in preparation, and for responding to motion in limine issues and objections, emailing trial counsel re same (4.0);	Gilliam, Matt B	5.0	\$1,750.00
06/16/2022	Preparing for pretrial conference and reviewing documents for same (2.0); attending pretrial conference (3.0); travel to and from local counsel office (2.0); preparing proposed email re witnesses and anticipated dates for testimony (.5); conference with Attorney Pryor and client re case status and trial strategy (1.3); trial prep and strategy (5.9)	Gilliam, Matt B	14.7	\$5,145.00
06/17/2022	Traveling back from Dallas for pretrial conference hearing (6.0); emails and calls with trial counsel re exhibit issues, witness issues, subpoena issues, and deposition issues (.5))	Gilliam, Matt B	0.5	\$175.00
06/20/2022	Corresponding with and emailing trial counsel re transcripts, trial subpoenas, L556 request for extending motion in limine deadline, exhibit issues and case materials for trial preparation, and SWA intent to quash trial subpoenas	Gilliam, Matt B	4.0	\$1,400.00
06/21/2022	Communicating with trial counsel re subpoena issues, witnesses for deposition and trial, coordinating service of trial subpoenas (4.0); preparing outlines and documents lists for trial counsel depositions and examination of witnesses Lacore and Rutherford (4.5); emailing Court and parties re new Carter motion in limine deadline (.5)	Gilliam, Matt B	9.0	\$3,150.00
06/22/2022	Communicating with trial counsel re exhibits, subpoena issues, witnesses for deposition and trial (3.0); preparing and sending emails to SWA and L556 counsel re witness issues (.5); reviewing deposition notices (.5); reviewing court order re motions in limine (.5); preparing outlines and documents lists for trial counsel depositions and examination of witnesses Talburt and Lacore (3.3); communicating with client re case status, depositions, and traveling to Dallas for trial (.3)	Gilliam, Matt B	7.8	\$2,730.00
06/23/2022	Communicating with trial counsel re Stone subpoena issues and Rutherford depo (2.4); preparing trial counsel with documents, outlines, and information for Lacore and Talburt deposition (3.0); reviewing L556 motion in limine and outlining and drafting response (5.3); preparing for Rutherford deposition (.5); sitting in on Rutherford deposition (1.0)	Gilliam, Matt B	12.2	\$4,270.00
06/24/2022	Communicating with trial counsel re Lacore depo (.5); preparing trial counsel with additional documents and information for Lacore deposition (2.0); drafting response to L556 motion in limine and sending draft to trial counsel (5.2); preparing for Lacore deposition (.5); sitting in on Lacore deposition (1.0); drafting and outlining Carter response to SWA motion to quash subpoenas (1.1); communicating with L556 counsel and attorney Gillespie re acceptance of service of Stone subpoena (.5)	Gilliam, Matt B	10.8	\$3,780.00

06/25/2022	Drafting and researching Carter response to SWA motion to quash subpoenas (4.1); communicating with trial counsel re trial strategy (.3); reviewing and incorporating trial counsel edits to Carter response to motion in limine (.5)	Gilliam, Matt B	4.9	\$1,715.00
06/26/2022	Preparing Burdine and Conlon deposition outlines and notes for trial counsel deposition and examination of witnesses (2.6); communicating with trial counsel re motion to extend time limits at trial and reviewing motion for same (.3); emailing trial counsel re trial planning tasks and issues involving witnesses,, depositions, exhibits, and subpoenas (.5)	Gilliam, Matt B	3.4	\$1,190.00
06/27/2022	Finalizing and filing response to L556 motion in limine (2.0); preparing trial counsel with documents, outlines, and notes for Hudson deposition and trial examinations (2.2); planning for travel and stay in Dallas for trial (2.1); revising motion to extend time limits (1.2); revising Carter response to SWA and L556 motion to quash (1.7); communicating with trial counsel re witness issues, exhibit issues, depositions, and trial examination strategy (1.5); communicating with Attorney Gillespie re Stone subpoena issues (.1); communicating with client re depositions (.1)	Gilliam, Matt B	8.8	\$3,080.00
06/28/2022	Finalizing and filing Carter response to defendants mot to quash (4.8); communicating with trial counsel re exhibits, trial examinations, trial objections, witnesses, motion to extend time limits, depositions (3.0); communicating with SWA and L556 re Hudson deposition (.5); emailing Attorney Gillespie to clarify Stone subpoena issues (.5); attending Conlon and Burdine depositions (2.0); drafting email and emailing SWA and L556 counsel re witness issues (1.0)	Gilliam, Matt B	11.8	\$4,130.00
06/29/2022	Prepare for and attend Nancy Cleburne deposition (.4); emailing SWA and L556 counsel re request to court to update exhibit file with additional exhibits (.5); continue revising motion to extend time limits and send to trial counsel with proposed revisions to affidavit (5.1); emailing trial counsel re revised motion to extend time and affidavit; preparing Lacore depo designations and notice (2.1); traveling to Dallas TX from Springfield VA for trial (9.8)	Gilliam, Matt B	8.1	\$2,835.00
06/30/2022	Finalize and file motion to extend time limits and prepare and file proposed order (3.0); draft and file motion for leave to submit exhibits with proposed order (2.5); conference with Attorney Pryor and Carter re trial (4.0); prepare depo designations and notice for Conlon and Cleburn (2.0); conferences with Attorneys Hill and Pryor re trial witnesses, order, time allocations (3.4)	Gilliam, Matt B	14.9	\$5,215.00

07/01/2022	Drafting, revising, conferring about and filing status report updating court regarding efforts to secure witnesses (3.5); communicating with opposing counsel re subpoena, deposition, and witness issues (1.0); reviewing court orders and L556 opposition motion re motions in limine, supplemental exhibits, and time limit extensions (1.0); conferences with Attorneys Hill and Pryor re subpoena, witness, and deposition issues (1.0); drafting depo examination notes and identifying relevant exhibits for Nevarez examination (2.1); obtaining copies of format compatible deposition videos to synch with trial software for witnesses to be presented by deposition (.5); conference with Attorney Pryor and client re trial preparation (4.5); communicating with client re pretrial planning, filings, and subpoena, deposition, and witness issues (1.0); drafting, revising, and filing Burdine depo designations, notice of filings, and deposition (1.5)	Gilliam, Matt B	14.0	\$4,900.00
07/02/2022	Drafting emails, emailing, and communicating with opposing counsel re Talburt deposition issues and co counsel re deposition issues (2.8); conferences with Attorneys Hill and Pryor re Talburt deposition and subpoena issues (3.0); researching subpoena service issues (2.0); drafting depo examination notes and identifying relevant exhibits for Talburt and Nevarez depo examinations (6.5); communicating with client re pretrial planning, filings, and subpoena, deposition, and witness issues (.5)	Gilliam, Matt B	14.8	\$5,180.00
07/03/2022	Communicating with opposing counsel re Talburt deposition issues and co counsel re deposition issues (.8); attending Talburt deposition (3.4); drafting examination notes and identifying relevant exhibits for Stone and Schneider trial examinations (8.4); conferences with Attorneys Hill and Pryor re trial strategy (1.0); communicating with client re pretrial planning, trial and subpoena, deposition, and witness issues (1.0)	Gilliam, Matt B	14.6	\$5,110.00
07/04/2022	Communicating with opposing counsel re Nevarez deposition and issues (.5); communicating with Attorney Hill re Nevarez depo examination and exhibits (.5); preparing for and attend Nevarez deposition (.5); conferences with Attorneys Hill and Pryor re trial opening statement (1.0), witnesses (1.0), potential sanctions against defendants re failure to make Nevarez available (1.0) and other trial issues such as witness duration and order (1.0); drafting trial examination notes and outline and identifying relevant exhibits for Stone and Schneider examinations (6.1); communicating with client re trial planning (.5); preparing Talburt deposition designations (2.5); drafting motion for sanctions to address Nevarez non appearance (2.7)	Gilliam, Matt B	12.1	\$4,235.00

07/05/2022	Conducting voir dire and selecting trial jury in court house and meeting with parties and Judge Starr prior to and after jury selection (5.0); preparing for voir dire and jury selection (2.5); finalizing and filing talburt deposition designations, deposition, and notice of depo designations (.6); revising, finalizing, filing, and conferring about sanctions motion for Nevarez no appearance at depo (3.0); ordering daily transcript (.2); communicating with parties and courtroom deputy kevin frye re next day exhibits and witnesses (.7); reviewing and preparing plaintiff response to defendants objections to exhibits (1.0); communicating with co counsel re trial objections, strategy, and witness examinations (2.5)	Gilliam, Matt B	12.5	\$4,375.00
07/06/2022	Preparing for and participating in trial and pre and post trial conferences between parties and court (13.9); reviewing and revising Carter response to SWA objections to Burdine designations (.5); communicating with parties and courtroom deputy kevin frye re next day exhibits and witnesses (.2); reviewing and preparing plaintiff response to defendants objections to exhibits (.2); communicating with co counsel re trial objections, strategy, and witness examinations (2.1)	Gilliam, Matt B	16.9	\$5,915.00
07/07/2022	Preparing for and attending trial and meeting with parties and Judge Starr prior to and after trial (12.0); communicating with parties and courtroom deputy kevin frye re next day exhibits and witnesses (2.2); drafting, reviewing, and filing responses to defendant depo designation objections (2.0); communicating with co counsel re trial objections, strategy, and witness examinations (2.0); preparing responses to defendant objections to exhibits (1.3)	Gilliam, Matt B	19.5	\$6,825.00
07/08/2022	Preparing for and attending trial proceedings including conference between the parties and Judge Starr (11.0); preparing for and attending Nevarez deposition (1.0); communicating with co counsel re trial strategy and examination of witnesses (1.0); preparing trial brief re whether RLA protected activity question is an issue for the court or jury (4.1); preparing trial brief re objections to court draft jury instructions (1.0)	Gilliam, Matt B	18.1	\$6,335.00
07/09/2022	Communicating with co counsel re trial strategy, examination of witnesses, directed verdict issues, and SWA request to supplement exhibits (1.5); finalizing, revising, and filing trial brief re whether RLA protected activity question is an issue for the court or jury (4.0); preparing trial brief re objections to court draft jury instructions (8.5); reviewing and editing Nevarez deposition designations and notice of filing depo designations (1.0); reviewing SWA request to file supplemental exhibits (.6)	Gilliam, Matt B	15.6	\$5,460.00
07/10/2022	Communicating with co counsel re trial strategy, examination of witnesses, and directed verdict issues, and SWA request to supplement exhibits (1.5); revising, researching, finalizing, and filing trial brief re objections to court draft jury instructions (6.0); finalizing and filing Nevarez deposition designations and notice of filing depo designations (.5); reviewing SWA and L556 exhibits and witnesses, preparing objections to SWA and L556 exhibits, and preparing responses to SWA and L556 objections to exhibits (2.2); preparing directed verdict outline (1.0)	Gilliam, Matt B	11.2	\$3,920.00

07/11/2022	Preparing for and attending trial proceedings, informal charge conference, and directed verdict arguments (10.3); communicating with co counsel re trial strategy, examination of witnesses, and directed verdict issues (1.5); reviewing and revising response and counter designations to SWA objections to Nevarez depo designations (1.0); reviewing SWA and L556 exhibits and witnesses, preparing objections to SWA and L556 exhibits, and preparing responses to SWA and L556 objections to exhibits (3.0)	Gilliam, Matt B	15.8	\$5,530.00
07/12/2022	Preparing for and attending trial proceedings, charge conference, and making directed verdict arguments (11.3); reviewing and organizing outline of witness testimony and exhibits for trial counsel closing arguments (6.0); communicating with co counsel re trial strategy, damages and closing arguments (2.0)	Gilliam, Matt B	19.3	\$6,755.00
07/13/2022	Preparing for and attending trial proceedings and attending court proceedings with parties to address jury questions (6.0); reviewing and organizing witness testimony and information for trial counsel closing arguments (3.0); communicating with co counsel re trial, closing arguments, and post trial case issues (3.9)	Gilliam, Matt B	12.9	\$4,515.00
07/14/2022	Preparing for and attending court to await jury verdict and attending court proceedings with parties to address jury questions (7.0); communicating with co counsel re verdict and post trial case issues (4.4)	Gilliam, Matt B	11.4	\$3,990.00
07/15/2022	Traveling back to Virginia from Dallas (8.6); researching cases and outlining issues for attorneys fees petition brief (4.0); researching cases and outlining issues for motion for entry of judgment, reinstatement, and other relief (3.0); communicating with co counsel re jury verdict and post trial proceedings (1.5)	Gilliam, Matt B	8.5	\$2,975.00
			544.8	\$190,680.00

Date	Narrative	Attorney	Hours	Amount
6/2/2022	Review docket entries and highlight entries needed for trial notebook and review; emails re the same; review scheduling order; emails re jury instructions and voir dire questions; review and outline Fourth Amended Complaint; review case law cited in Fourth Amended Complaint; teleconf w/M. Hill and M. Gilliam re status and strategy; review and outline issues relating to SW Airlines Answer to 4th Amended Complaint; emails re the same; review and outline issues re Local 566 Answer to 4th Amended Complaint; emails re the same; review deposition of M. Sims; outline issues re the same; emails re the same; review exhibits re the same; review reported cases involving M. Greenfield to determine whether any involved issues in present action; review reported cases involving P. McKeeby to determine whether any involved issues in present action	BGP	6.5	\$3,217.50
6/3/2022	Additional review and outline of deposition of M. Sims; outline voir dire and limine topics; prepare M. Sims deposition resume; create and supplement list of involved persons; review and outline arguments, authorities and evidence re summary judgment motions and responses	BGP	7.0	\$3,465.00

6/4/2022	Review Amended Scheduling Order re ensuring compliance; additional review and digest of M. Sims deposition; drafting proposed voir dire questions; file review re the same; review SW and Local 556 summary judgment motions and exhibits; review and digest E. Schneider deposition; review exhibits re the same; review pleadings related to the sanction motion; review pleading relating to filing documents under seal	BGP	6.3	\$3,118.50
6/5/2022	Review written discovery; emails re the same; outline issues re Southwest and Local 556 discovery responses; review witness and exhibit list outline comments to the same; prepare witness list by location and raise Rule 45 issues; emails re the same; review document production; continue deposition review and digest of the same; continue to update voir dire questions and limine issues	BGP	7.7	\$3,811.50
6/6/2022	Prepare for teleconf. re status and strategy; teleconf. w/M. Hill and M. Gilliam re voir dire, limine, witnesses, trial exhibit, statements of fact and law, jury instruction; teleconf w/opposing counsel re trial witnesses; review SW documents production re preparing exhibit list	BGP	7.5	\$3,712.50
6/7/2022	Review, revise and finalize voir dire questions; emails re the same; emails and calls re limine issues; review Judge Scholer opinion re the same; review arbitration transcript and exhibits; review SW draft pretrial order; emails and calls re the same; teleconf. w/counsel for Union re witness and exhibit issues; review jury charge and interrogatories; review parties written discovery responses; review all deposition exhibits re preparing exhibit list; review each exhibit listed by SW and supplement exhibit list for document not included by SW; review documents re Carter damages; review exhibit list prepared by M. Gilliam and review documents re the same; supplement exhibit list re the same; review pleading re failure to exhaust administrative remedies; prepare objections to SW exhibit list; email re the same; prepare questions to M. Gilliam re various issues relating to the pretrial order; emails re the same	BGP	13.5	\$6,682.50
6/8/2022	Analysis and revise draft voir dire questions; review documents re preparing exhibit list; emails re the same; review deposition exhibits and testimony related to the same; emails w/M. Gilliam re status and strategy; review documents added to witness list by defendants; emails re witness issues; review M. Emlet deposition and prepare designations re the same; emails re the same	BGP	6.8	\$3,366.00
6/10/2022	Review and approve subpoenas; review status emails	BGP	0.4	\$198.00
6/14/2022	Emails and calls re subpoena issues; review pretrial documents; confs and emails re the same	BGP	4.2	\$2,079.00

6/15/2022	Review and revise notice re unavailability of witnesses; review rules and Judge's order the same; emails and telecons. w/opposing counsel re the same; email to opposing counsel re requesting witness information; review Court's order re limine issues; review pretrial documents; prepare for pretrial conf.; revise draft filing availability of witnesses; strategize re same	BGP	6.3	\$3,118.50
6/16/2022	Prepare for pretrial conference; review documents re the same; review C. Carter deposition re preparation for client meeting; attend pretrial conference; conference w/M. Gilliam and C. Carter re status and strategy	BGP	6.4	\$3,168.00
6/17/2022	Emails and calls re exhibit issues; emails and calls re witness and deposition issues; emails re status and strategy	BGP	1.3	\$643.50
6/20/2022	Emails and confs. re depositions issues; review SW motion for summary judgment motion and exhibits, Carter response to the same and appendix to the same; conf. w/C. Garcia re referencing appendix numbers to trial exhibit list; emails re subpoena issues; review trial exhibits; emails re status and strategy; conf. w/D. Bruce re trial analysis and strategy	BGP	7.3	\$3,613.50
6/21/2022	Numerous emails and calls re witness issues; review file and emails re the same; review trial exhibits and depositions; general trial and deposition preparation	BGP	5.5	\$2,722.50
6/22/2022	Review documents and depositions in preparation for trial and deposition of Lacore; emails w/M. Gilliam re the same; additional emails and confs. re witness issues; general trial preparation; review limine rulings; review deposition notices; emails re the same; research re evidentiary objections; conf. w/D. Bruce re strategy	BGP	9.7	\$4,801.50
6/23/2022	Trial preparation and preparation for Lacore deposition; review documents, emails and confs. re the same	BGP	7.4	\$3,663.00
6/24/2022	Review, organize and outline deposition exhibits re Lacore; teleconf. w/M. Gilliam re the same; Lacore deposition; confs. re trial exhibits and general status and strategy; general trial prep	BGP	6.8	\$3,366.00
6/25/2022	General trial preparation; emails and calls w/M. Hill and M. Gilliam re status and strategy; emails w/opposing counsel re S. Lacore; emails and review of pretrial transcript re representation re S. Lacore; review and revise draft response to Local 556 motion in limine; emails and calls re the same; review response to motion to quash and emails re the same	BGP	4.2	\$2,079.00
6/26/2022	Review case law re trial time limits; review witness list re the same; review file re the same; draft Objection to Time Limits or, in the Alternative, Motion to Extend Time Limits; review and revise the same; draft affidavit re the same; emails re the same	BGP	3.6	\$1,782.00
6/27/2022	General trial preparation including review limine issues and rulings, outline 4th amended complaint facts, review trial exhibits and prepare notes and witness examination re the same, outline trial objects to limine issues denied, emails re punitive damage issues, outline C. Carter trial preparation issues	BGP	7.7	\$3,811.50

6/28/2022	Emails re probable and possible trial witnesses, assigning witnesses; status of subpoenas, Hudson deposition and order of witnesses; teleconf. w/M. Gilliam and M. Hill re the same; review trial exhibits re content and determination of use at trial with witnesses; emails re the same; emails re redacted information in certain exhibits; emails re additional trial exhibits; emails re Stone subpoena and witness fees; teleconf. re motion to enlarge time; conf. w/D. Bruce re trial strategy; emails re C. Carter preparation; review documents re Carter preparation; emails re trial objections to evidence and limine issues	BGP	8.6	\$4,257.00
6/29/2022	Digest C. Carter deposition; review exhibits re the same; general trial preparation; review supplemental exhibits and emails re the same; emails w/opposing counsel re witness issues; review order from Court re the same; review and revise status report; emails re the same; review and revise motion to enlarge time; emails re the same; review affidavit re the same	BGP	9.3	\$4,603.50
6/30/2022	Emails re deposition designations; prepare for C. Carter trial preparation; conf. w/C. Carter and M. Gilliam re the same; review and digest A. Stone deposition; review exhibits re the same; review and revise motion to enlarge and affidavit re the same; confs. re the same; emails re additional trial exhibits; confs. re the same; review court order re witnesses; confs. and emails re the same; confs. w/M. Hill and M. Gilliam re status and strategy; confs. re determining trial witnesses, order of the same and time allocations	BGP	9.6	\$4,752.00
7/1/2022	Review pleading re after-acquired evidence defense; emails re the same; prepare for C. Carter trial preparation session; conf. w/M. Gilliam and C. Carter re the same; review Burdine related documents; emails and confs. re press inquiries; review court second amended order on motions in limine; confs. and emails re the same; consider and outline evidence re the same; emails re communication w/Court re efforts to obtain Talburt deposition; review email from opposing counsel re Parker, Nevarez and Talburt subpoena issues; emails re the same; review draft status report re the same; emails w/opposing counsel re depositions; review latest court order re witness subpoenas and depositions; emails and confs. re the same; review Court order re late added exhibits; review deposition designations; review exhibits and prepare for examination of witnesses at trial	BGP	9.0	\$4,455.00
7/2/2022	Prepare witness notebooks for S. Lacore, B. Talburt and N. Hudson; review C. Carter deposition; emails re witness depositions; emails and confs. re B. Talburt deposition; review documents re Talburt deposition; Talburt deposition preparation; review exhibits and prepare for examination of witnesses at trial; emails re time limits on Talburt deposition	BGP	8.4	\$4,158.00

7/3/2022	Finalize preparation for Talburt deposition; prepare for Stone trial examination; review trial exhibits and highlight questions and related witnesses; review M. Gilliam notes re Talburt deposition; Talburt deposition' trial preparation	BGP	12.2	\$6,039.00
7/4/2022	Prepare opening and voir dire; continue review of trial exhibits and highlight questions and related witnesses; conf. w/M. Hill, M. Gilliam, and C. Carter re opening	BGP	11.8	\$5,841.00
7/5/2022	Additional preparation for opening and voir dire; prepare final anticipated witness list, order of witnesses and time allotments; review emails and court rulings re voir dire questions; conf, at trial w/court re voir dire issues and general trial matters; voir dire; hearing before court on strikes for cause; confs. re exercising peremptory challenges; hearing before court on trial matters; conf w/M. Hill and M. Gilliam re status and strategy	BGP	9.3	\$4,603.50
7/6/2022	Prepare for opening and Stone examination; conf. w/court re trial matters; trial including opening and Stone examination; post trial confs w/court; conf w/M. Hill and M. Gilliam re status and strategy	BGP	10.6	\$5,247.00
7/7/2022	Prepare for additional Stone examination and prepare for Schneider examination; prepare argument for additional jury time; conf w/court re trial matters including request for additional jury time; trial including examination of Stone and Schneider; post trial confs. w/court; conf w/M. Hill and M. Gilliam re status and strategy; preparation for additional Schneider examination and Carter examination	BGP	13.4	\$6,633.00
7/8/2022	Trial preparation; conf. w/court re trial matters; trial including examination of Schneider and Carter; conf. w/court re post trial matters; conf w/M. Hill and M. Gilliam re status and strategy	BGP	9.8	\$4,851.00
7/9/2022	Status email re invoking the rule issues, objecting to cyber bullying exhibit, future use of time, February 2017 RFB exhibit, Nevarez deposition, C. Carter testimony, potential Sim testimony, and directed verdict issues; emails re the same; review documents and emails re designation of workplace bullying policy; review court draft jury questions; review Local 556 brief re directed verdict issues; review SW brief re directed verdict issues; review C. Carter brief re directed verdict; review Nevarez designations	BGP	4.5	\$2,227.50
7/10/2022	Review notes re C. Carter direct examination and prepare for conclusion of the same; review documents re C. Carter damages; prepare examination re the same; prepare for opposition to late added exhibit re cyber bullying; review documents re the same; emails re damage issues; review directed verdict notes; organize Carter deposition re doctrine of optional completion on anticipated cross examination topics	BGP	5.6	\$2,772.00

7/11/2022	Additional preparation for C. Carter cross examination; prepare for informal charge conference; review draft instructions and questions re the same; informal charge conference; pretrial matters; trial including conclusion of C. Carter examination, resting C. Carter case, SW witnesses and post-trial issues; prepare for cross examination of Schneider and initial preparation for closing	BGP	12.6	\$6,237.00
7/12/2022	Emails and confs re damage issues; review daily trial transcripts re witness examination and closing preparation; review court draft jury charge; trial including cross examination of SW witnesses and C. Carter; review trial exhibits re preparation for demonstrative evidence during closing; conf w/M. Gilliam and M. Hill; charge conference; prepare for closing argument; teleconfs re the same	BGP	14.6	\$7,227.00
7/13/2022	Prepare for closing; emails and confs. re the same; pretrial conf. issues; trial including closing	BGP	10.3	\$5,098.50
				285.7 \$141,421.50

Date	Narrative	Attorney	Hours	Amount
6/1/2022	Email paralegal re drafting appearance of counsel; revise same; email B. Pryor and M. Gilliam re same; analysis of deadlines in scheduling order; conf. w/ M. Gilliam re documents needed and pretrial filings; review case filings in preparation for trial	MDH	4.2	\$1,659.00
6/2/2022	Confs. w/ M. Gilliam re pretrial filings and strategy; email exchanges w/ B. Pryor re documents to review; identify documents for review in preparation for trial; email exchanges w/ M. Gilliam re same; email exchange w/ B. Pryor re voir dire; email B. Pryor re authorities to review	MDH	3.4	\$1,343.00
6/3/2022	Analysis of witnesses who may be designated for deposition; email B. Pryor re use of depositions for witnesses outside subpoena range; confs. w/ B. Pryor re trial and pretrial strategy	MDH	2.6	\$1,027.00
6/4/2022	Review and comment on proposed email outlining pretrial tasks; review, comment, and supplement proposed voir dire questions	MDH	0.5	\$197.50
6/5/2022	Email B. Pryor re witness issues; email M. Gilliam re issues with motion to withdraw from J. Winford; email M. Gilliam re version of Rule 45 cited in Northern District cases	MDH	0.9	\$355.50
6/6/2022	Confs/ w/ M. Gilliam and B. Pryor re strategy and pretrial tasks; additional confs. w/ M. Gilliam re strategy and pretrial tasks; coordinate w/ M. Gilliam on obtaining additional documents; work on proposed jury charges and interrogatories; conf. w/ B. Pryor re settlement strategy; email exchanges w/ B. Pryor re pretrial tasks	MDH	7.8	\$3,081.00

6/7/2022	Continue work on jury instructions and jury interrogatories; comments on additional potential voir dire questions; confs. w/ M. Gilliam re pretrial tasks and strategy; email M. Gilliam re revised draft jury instructions; emails and confs. w/ B. Pryor re pretrial tasks and strategy; work on supplanting exhibit list and analyzing potential exhibits	MDH	11.3	\$4,463.50
6/8/2022	Prepare joint and separate jury charges; email B. Pryor and M. Gilliam re same; confs. w/ B. Pryor and M. Gilliam re same; review and comment on proposed objections to disputed jury charges; conf. w/ M. Gilliam re punitive damages issue; review, comment, and supplement issues of law for pretrial filing; confs. w/ M. Gilliam re pretrial filings; review and revise issues of law for pretrial order; work on objections to Southwest's and the union's jury interrogatories; email M. Gilliam re same	MDH	12.4	\$4,898.00
6/9/2022	Revisions to proposed pretrial order; email exchanges w/ M. Gilliam re same; prepare proposed email to P. McKeeby re pretrial order structure; email M. Gilliam re subpoenas; conference w/ M. Gilliam and opposing counsel re pretrial order; review and comment on Southwest's motion in limine; email opposing counsel re exhibit list; email paralegal re preparing subpoenas; revies, comment on, and revise motion in limine; review and comment on deposition designations; additional work on jury interrogatories and instructions; email M. Gilliam re same; confs. w/ M. Gilliam re same and pretrial filings; email B. Morris re proposed exhibit 1 to pretrial order; prepare insert for pretrial filings re punitive damages; confs. w/ opposing counsel re pretrial filings; assist with finalization of pretrial filings	MDH	14.3	\$5,648.50
6/10/2022	Email M. Gilliam re subpoena form; conf. w/ M. Gilliam re witness issues; conf. call w/ M. Gilliam and opposing counsel re witness issues; prepare email to opposing counsel re subpoenas; review subpoenas	MDH	3.2	\$1,264.00
6/11/2022	Work on joint status report objections; work on counter-designations and objections re Audrey Stone; review authority re conscience of the community and golden rule limine motions; email M. Gilliam re same; email M. Gilliam re comments, revisions, and additions to joint report on objections	MDH	4.1	\$1,619.50
6/13/2022	Revision to objections to jury interrogatories; email exchange w/ M. Gilliam re same; review and comment re charge; email P. McKeeby re additional objection; email P. McKeeby re depositions; work to finalize Joint Status Report	MDH	2.7	\$1,066.50
6/14/2022	Conf. w/ B. Pryor and M. Gilliam re pretrial issues and strategy; supervise subpoena issues; email M. Gilliam re same	MDH	0.8	\$316.00
6/15/2022	Review and comment re Notice of Unavailable Witnesses; additional emails and comments re same; email process server re witnesses to serve; email M. Gilliam re authority on collateral sources	MDH	1.1	\$434.50

6/16/2022	Attend pretrial conference and viewing of voir dire room; prepare proposed email re dates of testimony	MDH	4.4	\$1,738.00
6/17/2022	Review case recommended by court re business records; email B. Pryor re same; email M. Gilliam and B. Pryor re exhibit issues; call P. McKeeby and A. Greenfield re deposition dates; email B. Pryor and M. Gilliam re deposition issues; confs. w/ B. Pryor re pretrial and trial strategy issues	MDH	1.7	\$671.50
6/18/2022	Analysis of witness issues regarding trial witnesses and those to be deposed	MDH	0.4	\$158.00
6/20/2022	Conf. w/ B. Pryor re trial logistics and planning; email M. Gilliam re obtaining pretrial conference transcript; email P. McKeeby re depositions; conf. w/ M. Gilliam re witness importance; email M. Gilliam re deposition video logistics; prepare proposed email to opposing counsel re witness issues; email exchange w/ M. Gilliam and B. Pryor re same; email opposing counsel re same; email M. Gilliam re subpoena issues; conf. w/ M. Gilliam re same; email court reporter re videographer needed	MDH	3.2	\$1,264.00
6/21/2022	Email exchange w/ B. Pryor and M. Gilliam re union's extension filing; emails to court reporter re additional deposition scheduled; email B. Pryor and M. Gilliam re deadline to respond to union's motion in limine; review and comment on deposition notices; email M. Gilliam re flight attendant schedule; prepare proposed email to P. McKeeby re deposition issues; conf. w/ M. Gilliam re same; prepare proposed email to P. McKeeby re trial witness scheduling; follow-up email to M. Gilliam re deposition issues; conf. w/ P. McKeeby re deposition issues; email B. Pryor and M. Gilliam re same; email P. McKeeby re same; prepare email to E. Cloutman re witness issues	MDH	6.4	\$2,528.00
6/22/2022	Prepare for deposition of L. Rutherford; review and comment on proposed email to union re witness issues; email paralegal re subpoena form for depositions; revise deposition notices; email opposing counsel re deposition notices; email M. Gilliam re searchable trial exhibits; conf. w/ M. Gilliam re deposition logistics; email P. McKeeby re same; email court reporter re protective order; email M. Gilliam re signed copies of same; review subpoenas and witness fee calculations; email M. Gilliam re subpoena status; review court's amended order re motions in limine; email M. Gilliam re same; email court reporter re serving Talbert	MDH	8.3	\$3,278.50
6/23/2022	Email M. Gilliam re Stone subpoena waiver issues; additional preparation for Rutherford deposition; email opposing counsel re exhibits for Rutherford deposition; take deposition of L. Rutherford; confs. w/ M. Gilliam re same; email court reporter re timing of transcript; email M. Gilliam re same; email exchange w/ B. Pryor re Lacore exhibits; conf. w/ B. Pryor re Lacore deposition strategy; research re conferences at deposition breaks; email B. Pryor re findings on same; review Southwest's motion to quash subpoenas	MDH	7.3	\$2,883.50

6/24/2022	Email M. Gilliam re Nevarez service status; review and comment on proposed email to P. McKeeby re Lacore availability for trial; email M. Gilliam re Stone subpoena to send for waiver of service; review Lacore trial subpoena; email M. Gilliam re same; research re court-imposed time limits; email B. Pryor and M. Gilliam re same; email B. Pryor re witness list; review depositions in preparation for trial	MDH	6.4	\$2,528.00
6/25/2022	Email B. Pryor re Southwest's position at pretrial conference on Lacore availability; email B. Pryor re trial witness identities; revise response to Local 556's motion in limine; email M. Gilliam re same; email M. Gilliam re Nevarez affidavit of service; review and comment on response to motion to quash; identify authority re court's inherent power to compel witnesses to trial; email M. Gilliam re same	MDH	3.8	\$1,501.00
6/26/2022	Email B. Pryor re witnesses to be deposed; review and revise objection to time limits; email M. Gilliam re witness statuses; review materials in preparation for depositions of Conlon and Burdine	MDH	4.1	\$1,619.50
6/27/2022	Email court reporter confirming depositions of Conlon and Burdine; download trial software and review operation; email B. Pryor re response to motion in limine; email B. Pryor and M. Gilliam re service status of Hudson; email M. Gilliam re exhibit question; email M. Gilliam re comments on response to motion to quash; confs. w/ M. Gilliam re deposition questions and trial strategy; email paralegal re information for Talburt service; email M. Gilliam re Stone subpoena issues; email process server emphasizing importance of timing in Talburt service; confs. w/ B. Pryor and M. Gilliam re trial strategy and witness assignments; follow-up emails re same; prepare for depositions of Conlon and Burdine	MDH	8.7	\$3,436.50
6/28/2022	Finish preparing for Conlon deposition; email exhibits to opposing counsel and court reporter; depose B. Conlon; confs. w/ M. Gilliam re same; email paralegal re Lacore subpoena; conf. w/ M. Gilliam re Cleburn deposition; email court reporter re exhibits and timing; conf. w/ B. Pryor and M. Gilliam re witness strategy; email B. Pryor and M. Gilliam re Stone waiver of service requirements; review and comment on proposed email re Hudson deposition cancellation and trial attendance; email M. Gilliam re language for email to opposing counsel re Conlon's deposition testimony being used at trial; update response to motion to quash with service statuses; email M. Gilliam re same; email court reporter re cancellation of Hudson deposition; email M. Gilliam proposed language re confirmation on Stone attendance; prepare for deposition of N. Cleburn; review and comment on proposed email to opposing counsel on witness issues	MDH	10.4	\$4,108.00

6/29/2022	Email paralegal re additional exhibits; email M. Gilliam re deposition invoices; final preparation for Cleburn deposition; depose N. Cleburn; email court reporter re exhibits and delivery; conf. w/ M. Gilliam re deposition; conf. w/ B. Pryor re deposition highlights; review and comment on objection to time limits and affidavit re same; prepare chart for joint status report; email M. Gilliam and B. Pryor re same; email P. McKeeby re same; conf. w/ K. Frye re scheduling courtroom technology test; work on joint status report ordered by court on witness issues; email B. Pryor and M. Gilliam re same; email paralegal re same; email P. McKeeby re same; confs. and emails w/ opposing counsel re finalizing joint status report; finalize same for filing; <u>prepare deposition designations for L. Rutherford</u>	MDH	10.6	\$4,187.00
6/30/2022	Review and comment on deposition designation filings; email paralegal re Rutherford designations; email M. Gilliam re same; email video sync firm re protective order acknowledgement; additional revisions to motion to extend time limits; confs. w/ M. Gilliam and B. Pryor re same; confs. w/ M. Gilliam and B. Pryor re trial strategy and witnesses; conf. w/ C. Carter re trial; prepare designations for Conlon and Cleburn depositions; email M. Gilliam re same; email opposing counsel re motion regarding time limits; email opposing counsel re protective order issues; email opposing counsel re exhibit issue; additional revisions to motion re time limits and affidavit; email opposing counsel in response to order on witnesses; email video sync company re file format for transcripts; additional conf. w/ M. Gilliam and B. Pryor re witness strategy and timing; email videographer re status of deposition videos; review errata sheets from Rutherford and Lacore; email M. Gilliam re same; review and comment on motion for leave to submit exhibits; email exchange w/ M. Gilliam re same; review and comment on deposition designations	MDH	9.4	\$3,713.00
7/1/2022	Review pleadings re after-acquired evidence; email M. Gilliam and B. Pryor re same; email process server re service of Talburt; meet w/ K. Frye at courthouse to test video setup for trial; email exchange w/ R. Jones re synching deposition videos; review and comment on proposed email to opposing counsel re Parker, Talburt, and Nevarez depositions; review and revise status report on witnesses; review and approve deposition subpoenas of Talburt and Nevarez; set up synched transcripts in presentation software; set up exhibits re same; prepare draft email to P. McKeeby re witness status; prepare email to process server re Talburt; revise deposition notices to Talburt and Nevarez; prepare additional draft email to P. McKeeby re deposition issues; email process server re Nevarez; email court reporter/videographer re noticed depositions; conf. w/ process server re Nevarez; prepare draft designations for Burdine	MDH	8.6	\$3,397.00

7/2/2022	Prepare for examination of B. Nevarez; emails to P. McKeeby re depositions of Talburt and Nevarez; prepare presentation software for presentation of exhibits and videos; review and comment on juror diagram; revise juror chart; select portions of Conlon deposition to designate; email Burdine questioning clip to B. Pryor for use with Schneider; review documents sent by C. Carter; conf. w/ P. McKeeby re Talburt deposition; follow-up email re same; conferences w/ M. Gilliam and B. Pryor re trial preparation; email court reporters re deposition scheduling; work on witness order and strategy; prepare new subpoena for B. Talburt; confs. w/ process server re serving Talburt; prepare draft email to E. Cloutman re deposition of Talburt; follow-up email to court reporters with update; email exchange w/ P. McKeeby re deposition scheduling	MDH	9.4	\$3,713.00
7/3/2022	Email P. McKeeby re Talburt deposition scheduling; email court reporters updating re same; continue preparing for deposition of B. Nevarez; identify exhibits for same; analysis of potential additional exhibits; email P. McKeeby re deposition; prepare exhibits for trial; confs. w/ B. Pryor and M. Gilliam re trial strategy; email opposing counsel re Talburt exhibits	MDH	9.2	\$3,634.00
7/4/2022	Additional preparation for Nevarez deposition; finalize jury charts; email M. Gilliam re same; attend non-appearance by B. Nevarez at deposition; comment on proposed opening from B. Pryor; strategy re witness order and trial presentation; prepare for examination of J. Parrott; prepare for examination of M. Sims; email M. Gilliam re potential justifications for sanctions on defendants re depositions; prepare for trial	MDH	10.8	\$4,266.00
7/5/2022	Review and comment re motion for compliance with court order; conf. w/ M. Gilliam re same; email exchange w/ M. Gilliam re daily transcripts; review and comment on proposed order on failure to appear; email OnCue re issues displaying exhibits; email B. Pryor re objections to make at trial; notes re preparation for voir dire; attend voir dire; prepare proposed exhibit email for court; prepare unredacted exhibits; prepare designations for J. Parker; preparations for potential witness examinations	MDH	10.6	\$4,187.00
7/6/2022	Attend trial; email S. Rhea re exhibit list; email OnCue re support for presentation software; email M. Gilliam re designation objections; prepare responses to objections re Parrott and Rutherford designations	MDH	11.4	\$4,503.00

7/7/2022	Revisions to responses to objections to Parrott and Rutherford designations; email S. Silver re Exhibit 21; attend trial; email paralegals re redactions; revise Talburt designations to cut time; edit video re same; email paralegals re serving Nevarez; email opposing counsel re service of Nevarez; conf. w/ process server re same; email process server re revisions to declaration; prepare proposed declaration re same; email K. Willis re Talburt designations; email M. Gilliam re status of same	MDH	11.3	\$4,463.50
7/8/2022	Email exchange w/ M. Gilliam re process server declaration; prepare Zoom link for Nevarez deposition; email court reporters and opposing counsel re same; attend trial; prepare for Nevarez deposition; take Nevarez deposition; confs. w/ B. Pryor and M. Gilliam re same; email videographer re same; email B. Pryor and M. Gilliam re excusing Parrott and Shaffer; email M. Gilliam re notifying court on Nevarez deposition; email court re same	MDH	11.6	\$4,582.00
7/9/2022	Email answers to trial strategy questions from B. Pryor; review and comment on draft trial brief; conf. w/ M. Gilliam re same; email potential authority for use in same to M. Gilliam; email R. Jones re synching Nevarez transcript; review and revise trial brief; email M. Gilliam re same; prepare designations for B. Nevarez; prepare video re same	MDH	5.6	\$2,212.00
7/10/2022	Email M. Gilliam re Nevarez designations; email B. Pryor re C. Carter direct strategy; review and comment on jury charge trial brief; identify exhibits to object to; review and comment on draft objections; email S. Silver re Exhibit 147	MDH	4.2	\$1,659.00
7/11/2022	Identify objections to deposition counter- designations by Southwest; prepare draft objections; email M. Gilliam re same; attend trial; email opposing counsel re redacted exhibits; email B. Pryor re Schneider transcripts; review and comment on potential objections; email K. Frye re redacted exhibits; email B. Pryor and M. Gilliam re accommodation language; prepare exhibit re net worth; email B. Pryor re strategy re same	MDH	11.2	\$4,424.00
7/12/2022	Attend trial; analysis of court's jury charge; conf. w/ B. Pryor re closing; prepare materials re same; email B. Pryor re strategy for union punitive damage argument; work on preparing exhibits and testimony for closing; email B. Pryor re outline re same	MDH	16.8	\$6,636.00
7/13/2022	Work on identifying additional testimony for closing; prepare highlights re same; prepare exhibits re same; attend trial; strategy re jury question	MDH	6.1	\$2,409.50
7/14/2022	Strategy re jury questions; analysis of verdict; wrap up trial and remove documents from courtroom	MDH	1.6	\$632.00
			282.8	\$111,706.00

Total Pre-trial/Trial Time Expended	1113.3	\$443,807.50
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